

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

-----X		
STACEY GALPERIN, MIRIAM ROCEK,	:	
HANNAH SHAFFER, HEIDI SHAFFER,	:	
and MARLENE DEVONSHIRE, as the	:	
Natural Guardian of MEGHAN DEVONSHIRE	:	
	:	
Plaintiffs,	:	
v.	:	Civil Action No. 06-359 (GMS)
	:	
DELAWARE STATE POLICE	:	
SERGEANT MARK DIJIACOMO, and	:	JURY TRIAL DEMANDED
JANE DOE,	:	
	:	
Defendants.	:	
-----X		

**AMENDED NOTICE OF DEPOSITION OF
AMANDA WINNINGTON AND BARNES & NOBLE**

TO: Ralph K. Durstein III, Esquire
 Deputy Attorney General
 Carvel State Office Building
 820 N. French Street, 6th Floor
 Wilmington, Delaware 19801

PLEASE TAKE NOTICE that plaintiffs will take the deposition upon oral examination of Amanda Winnington on October 12, 2006 at 1:00 p.m., at the offices of Rosenthal Monhait & Goddess, P.A., 919 Market Street, Suite 1401, Citizens Bank Center, Wilmington, Delaware 19899, before an officer authorized by law to administer oaths. Testimony shall be recorded by stenographic means.

Ms. Winnington will also be deposed as the designee of Barnes & Noble ("B&N") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, pursuant to the subpoena served on B&N, a copy of which is attached to the Notice Of Taking Deposition Of Barnes & Noble Pursuant To Federal Rule Of Civil Procedure 30(b)(6) [Docket #16] filed on October 6, 2006.

A copy of the subpoena served on Ms. Winnington is attached to the Notice Of Deposition [Docket #17](the date of the deposition has been changed subsequent to service).

The deposition shall continue from day to day until completed. You are invited to attend and participate.

ROSENTHAL, MONHAIT & GODDESS, P.A.

By: 

Norman M. Monhait (#1040)
919 Market Street, Suite 1401
Citizens Bank Center
P.O. Box 1070
Wilmington, Delaware 19899-1070
(302) 656-4433
Email: nmonhait@rmgglaw.com

HANGLEY ARONCHICK SEGAL & PUDLIN
Gordon A. Einhorn (Admitted *pro hac vice*)
Paul W. Kaufman (Admitted *pro hac vice*)
30 N. Third Street, Suite 700
Harrisburg, PA 17101
(717) 364-1004

OF COUNSEL: Attorneys for Plaintiffs

AMERICAN CIVIL LIBERTIES UNION
OF PENNSYLVANIA
Mary Catherine Roper (Pro Hac Vice Pending)
P.O. Box 40008
Philadelphia, PA 19106

Witold Walczak
313 Atwood Street
Pittsburgh, PA 15213

Seith Kreiner
3400 Chestnut Street
Philadelphia, PA 19104

AMERICAN CIVIL LIBERTIES UNION
OF DELAWARE
Julia Graff (#4708)
100 W. 10th Street, Suite 309
Wilmington, Delaware 19801

October 9, 2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of October, 2006, a copy of the **Amended Notice Of Deposition** was served, by electronic filing, upon:

Ralph K. Durstein III, Esquire
Deputy Attorney General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, Delaware 19801

A handwritten signature in black ink, appearing to read "Norman M. Monhait", is written over a horizontal line.

Norman M. Monhait (#1040)